

# **Exhibit B**

**SUPPLEMENTAL DECLARATION OF YORJAN DIAZ**

I declare under penalty of perjury that the following is true and correct:

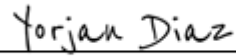
1. My name is Yorjan Diaz. I am competent and over the age of 18.
2. I am Chief Executive Officer of Yorisdidi Marketing (“YM”). I perform various job duties that support the operations of YM as CEO.
3. This declaration is based on my personal knowledge and review of documents which are maintained in the ordinary course of business by YM and which were made at or about the time of the events described therein. I routinely viewed, searched, and interpreted the records I rely upon to make this declaration. If called and sworn as a witness, I could and would competently testify to the matters discussed herein.
4. In my prior declaration dated October 3, 2020, I explained that YM conducted a telemarketing campaign for Realgy between November 1, 2019 and March 31, 2020 (“relevant period”) using only live agents. For that campaign, YM engaged Proactive BPO, SkyMax Contact Center, and Sales Expert BPO.
5. Because YM ran the telemarketing campaign, I had access to and routinely reviewed records of the calls Proactive BPO, SkyMax Contact Center, and Sales Expert BPO placed during the Realgy campaign. I am also personally familiar with how all three entities maintained their call records—which were automatically generated and maintained in the ordinary course of business—including because I had access to such records and routinely obtained information about specific calls throughout the Realgy campaign.
6. I noted in my prior declaration that: (a) no one working on the Realgy campaign called Ms. Lindenbaum’s 216-407-2902 and 216-381-5581 telephone numbers on November 26, 2019, March 3, 2020, or on any other date; and (b) YM never permitted or placed prerecorded calls

of any kind. Further, because the records/calling systems for the Realgy campaign only permit a user to search for specific calls to a phone number, there are no records establishing the absence of calls on certain days. In other words, the records/calling systems only have records for calls that occurred.

7. I now understand that Roberta Lindenbaum claims that the November 26, 2019 call was purportedly from 216-407-9803, and that the March 3, 2020 call was purportedly from 216-612-0211. I am familiar with the phone numbers used for the Realgy campaign. Neither 216-407-9803 nor 216-612-0211 were used or permitted during the Realgy campaign.

I declare under the penalty of perjury that the foregoing is true and correct under the laws of the United States of America.

Executed this 15 -day of May 2022 at 19:20\_\_\_\_\_.

Handwritten signature of Yorian Diaz in black ink, written over a horizontal line.

Yorian Diaz